IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§ Chapter 11
	§
PHI, Inc., et al., ¹	§ Case No. 19-30923-hdh11
	§
Debtors.	§ (Jointly Administered)

AFFIDAVIT OF ENOCH KEVER PLLC

STATE OF TEXAS)
)
COUNTY OF TRAVIS)

Amy Saberian, being duly sworn, deposes and says:

- 1. I am a Member of Enoch Kever PLLC (the "Firm"), which maintains offices at 5918 W. Courtyard Drive, Suite 500, Austin, Texas 78730.
- 2. Neither I, the Firm, nor any partner, associate, or other member thereof, insofar as I have been able to ascertain, has any connection with the above-captioned debtors (collectively, the "Debtors"), their creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee, except as set forth in this affidavit.
- 3. The Firm, through myself and other attorneys/employees of the firm, has represented and advised the Debtors with respect to legal counsel in connection with Case No. 18-0216, *Texas Mutual Insurance Company et al. v. PHI Air Medical, LLC*, pending at the Texas

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: PHI, Inc. (5707), PHI Air Medical, L.L.C. (4705), AM Equity Holdings, L.L.C. (0730), PHI Tech Services, Inc. (5089) and PHI Helipass, L.L.C. (4187). The corporate headquarters and the mailing address for the Debtors listed above is 2001 SE Evangeline Thruway, Lafayette, LA 70508.

Supreme Court as well as being counsel of record and monitoring matters before the Department of Insurance, Division of Workers' Compensation, and the State Office of Administrative Hearings that concern medical fee disputes.

4. The Debtors have requested, and the Firm has agreed, to continue to represent the Debtors pursuant to section 327 of title 11 of the United States Code (the "Bankruptcy Code") with respect to such matters. Additionally, the Debtors have requested, and the Firm proposes, to render the following services to the Debtors:

PHI Air Medical, LLC ("PHI") in Case No. 18-0216, *Texas Mutual Insurance Company et al. v. PHI Air Medical, LLC*, pending at the Texas Supreme Court.

- 5. The Firm's current customary hourly rates are \$750 to \$325 per hour. In the normal course of business, the Firm revises its regular hourly rates annually each year and requests that, effective the first of each year, the aforementioned rates be revised to the regular hourly rates which will be in effect at that time.
- 6. In connection with the above-captioned bankruptcy cases (the "<u>Chapter 11</u> <u>Cases</u>"), the Firm has rendered services to the Debtors that have not yet been billed or that have been billed but for which payment has not been received. The value of such services does not exceed \$8,459.17 in fees and \$28.81 in expenses (thru 4/30/19).
- 7. Except as set forth herein, no promises have been received by the Firm as to compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Rules, and orders of this Court.
- 8. The Firm has no agreement with any entity to share any compensation received from the Debtors.

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- 9. The Firm and its partners and other members may have in the past represented, currently represent, and may in the future represent entities that are creditors of the Debtors in matters totally unrelated to the matters with respect to which the Firm is to be engaged by the Debtors. However, neither I, the Firm, nor any partner or other member thereof, insofar as I have been able to ascertain, holds, or represents any interest adverse to the Debtors or their estates in the matters upon which the Firm is to be engaged.
- 10. The foregoing constitutes the statement of the Firm pursuant to sections 329 and 504 of the Bankruptcy Code and Fed. R. Bankr. P. 2014 and 2016(b).

Amy Saberian

Sworn to and subscribed before me this 10th day of June, 2019.

Notary Public, State of Texas

BRENDA MANN NOTARY PUBLIC STATE OF TEXAS MY COMM. EXP. 6/8/21 NOTARY ID 384029-5